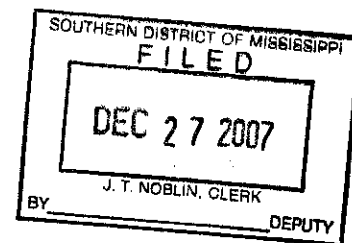


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

JAMES ALFORD;
RUTHIE ALLEN;
WILLIE LEE ALLEN;
REUBEN ANDERSON;
M.C. ARNOLD;
TONY ARNOLD;
CLARA BALDRIDGE;
GARY BANKS;
MELVIN BANKS, JR.;
JACKIE BARNES;
JOHNNIE BECKLEY;
MATTIE BENNETT;
JERRY BENSON;
JACQUELINE BOLIN;
GARY BRENT;
MARY BRENT;
THELMA BRENT;
WILLIAM BRENT;
SUSAN BREWER;
MARY BRIDGES;
HAL BRONSON, IV.;
IRMA BROWN;
JOHN BROWN;
JOHNNIE BROWN;
INEZ BRUMFIELD;
NORMA BUCKLEY;
WALTER BUIE;
BERTHA CARAWAY;
LARRY CHRISTMAS;
SHERRY CHRISTMAS;
CHARLENE COLLINS;
FELICIA COOLEY;
JESSIE COOPER;
GEORGE COPELAND;
MINNIE COPELAND;
JOHNNIE CRAFT;
CLARA CRAIG;
HELEN CUNNINGHAM;
JOHN CUNNINGHAM, JR.;
SANDRA DAVIS;
DENNIS DAVIS;
MARY DAVIS;
WILLIE DAVIS;

3:07cv756-HTW-LRA



S.L. DAWSON;
JESSIE DICKENS;
CHARLES DIXON;
LINDON DIXON;
RICHARD DIXON;
VIRGINIA DIXON;
LARRY EDWARDS;
MICHAEL EDWARDS;
JOHNNIE EVANS;
JULIET EVANS;
WALTER EVANS;
WILLIE FUNCHESS;
WILLIE TAYLOR FUNCHESS;
ROBERT GARY;
SONYA GILMORE;
BETTY GLASPER;
GRACE GLASPER;
O.T. GLASPER;
LINDA GOODWIN;
DOROTHY GRAHAM;
BILLY GREEN;
KENNETH GREEN;
JOHNNIE GRIFFIN;
LARRY HACKETT;
BOBBY HARRIS;
EARNEST HARRIS;
GLORIA HARRIS;
MARTHA HARRIS;
MARY HARRIS;
CYNTHIA HARRISON;
LARRY HARRISON;
LESSIE HARRISON;
CHRISTINE HARTLEY;
NELLIE HOLLIE;
ANGELA HOLLOWAY;
GLENDA HOWARD;
JAMES HUDSON;
MONA HUDSON;
BARBARA JACKSON;
DORIS JACKSON;
MICHAEL JACKSON;
RANDY JEFFERSON, SR.;
QUEEN JENKINS;
RICHARD JENKINS;
DOROTHY JOHNSON;
JAMES JOHNSON;

OSCAR JOHNSON;
WILLIE JONES;
BRENDA KENDRICK;
KENNETH KENDRICK;
LEVERNE KENDRICK;
LINDA KENDRICK;
ROBERT KENDRICK;
THOMAS KENDRICK;
YOLUNDA KING;
HENRY LEWIS;
HUGH LEWIS;
J.D. LEWIS;
ORA LEWIS;
SARAH LEWIS;
ERVIN LILLY;
SANDRA LILLY;
MINNIE LITTLE;
BREATRICE LOCKETT;
REGINALD LOWERY;
NANCY MARTIN;
LURENE MASSEY;
MARTHA MATTHEWS;
GEORGIA MCCALL;
T. ELLA MILES;
LENA MILLER;
SARAH MILLER;
ARNICE MILLSAPS;
BOBBIE MITCHELL;
MAE MORRIS;
HENRY MORRIS, JR.;
RAYFORD MORRIS;
JAMES MURRAY;
LOUBERTHA MURRAY;
EDWARD MYERS;
REBECCA MYERS;
CARRIE NEWELL;
FARIS NEWELL;
MARY NEWELL;
MICHAEL NEWELL;
MARY NICHOLS;
ROBERT OSBOURNE;
CARL PALMER;
KATHY PALMER;
SHIRLEY PATRICK;
DEBRA PATTERSON;
KENNETH PICKETT;

DEBORAH PILLERS;
JERMAINE PORTER;
JOHNNIE PORTER;
DOZIE POWELL;
EDDIE POWELL, JR.;
ELI POWELL;
ERMA POWELL;
GEORGIA MAE POWELL;
JOHNNIE POWELL;
LILLIE POWELL;
MICHAEL POWELL;
DONALD RANDALL;
LINDA RAYFORD;
ENOCHUS RHYMES;
JESSIE RHYMES;
ROBERT RHYMES;
DWIGHT RICHARDSON;
RANDY ROBINSON;
RUTH ROBINSON;
LORENE SLIGH;
BRENDA SMILEY;
THOMAS SMILEY;
DOROTHY SMITH;
RICHARD SMITH;
MARY STEWART;
SCOTTIE STEWART;
JAMES STURGIS;
SIDNEY SUTTON, JR.;
E. CHARLES TAYLOR;
EMMA TAYLOR;
CARL TERRELL;
JERRY TERRELL;
JULIA TERRELL;
BEVERLY THEDFORD;
WILSON THIGPEN;
CATHERINE TILLMAN;
LIGE TILLMAN;
NATHANIEL TOBIAS;
GLADYS TOLIVER;
TONI TOLIVER;
EARLY TYLER;
DARRYL WADE;
PAULINE WADE;
ULYSSES WADE, JR.;
J.T. WALLACE;
W.J. WALLACE;

AMELIA WAY;
ELIZABETH WELCH;
JAMES WELCH;
PATRICIA WELCH;
J.C. WELLS;
RUTH WELLS;
STELLA WELLS;
JOHNNIE WESTMORELAND;
EDWARD WHEELER;
BRENDA WILLIAMS;
DIANNE WILLIAMS;
LORINE WILLIAMS;
SHIRLEY WILLIAMS;
STACEY WILLIAMS;
TABBETHA WILLIAMS;
SARA WILLIS;
BETTY WILSON;
DENISE WILSON;
EDWRICK WILSON, SR.;
LEMUEL WILSON;
MARCELLOUS WILSON;
MELVIN WILSON;
RODRICK WILSON;
SHARON WILSON;
TRENISE LASHUN WILSON;
GRACE YOUNG;
JOHNNY YOUNG, SR.; AND
LINDA YOUNG

PLAINTIFFS

v. CIVIL ACTION No. 3:07CV756 HTW-JCS

KUHLMAN CORPORATION;
KUHLMAN ELECTRIC CORPORATION;
BORGWARNER, INC.; and
JOHN DOES 1 – 10

DEFENDANTS

COMPLAINT
(Jury Trial Requested)

COME NOW the Plaintiffs, by and through counsel, and file this *Complaint* against the Defendants, Kuhlman Corporation, a Delaware Corporation, Kuhlman Electric Corporation and BorgWarner, Inc., and in support thereof, Plaintiffs would show as follows:

PARTIES

1. Plaintiff, James Alford, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.
2. Plaintiff, Ruthie Allen, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.
3. Plaintiff, Willie Lee Allen, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.
4. Plaintiff, Reuben Anderson, is an adult resident citizen of Terry, Hinds County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.
5. Plaintiff, M.C. Arnold, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.
6. Plaintiff, Tony Arnold, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.
7. Plaintiff, Clara Baldridge, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.
8. Plaintiff, Gary Banks, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.
9. Plaintiff, Melvin Banks, Jr., is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.
10. Plaintiff, Jackie Barnes, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.
11. Plaintiff, Johnnie Beckley, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

12. Plaintiff, Mattie Bennett, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

13. Plaintiff, Jerry Benson, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

14. Plaintiff, Jacqueline Bolin, is an adult resident citizen of Jackson, Hinds County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

15. Plaintiff, Gary Brent, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

16. Plaintiff, Mary Brent, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

17. Plaintiff, Thelma Brent, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

18. Plaintiff, William Brent, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

19. Plaintiff, Susan Brewer, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

20. Plaintiff, Mary Bridges, is an adult resident citizen of Avondale, Jefferson Parish, Louisiana, and previously resided in Crystal Springs, Copiah County, Mississippi.

21. Plaintiff, Hal Bronson, IV, is an adult resident citizen of Jackson, Hinds County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

22. Plaintiff, Irma Brown, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

23. Plaintiff, John Brown, is an adult resident citizen of Crystal Springs, Copiah

County, Mississippi.

24. Plaintiff, Johnnie Brown, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

25. Plaintiff, Inez Brumfield, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

26. Plaintiff, Norma Buckley, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

27. Plaintiff, Walter Buie, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

28. Plaintiff, Bertha Caraway, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

29. Plaintiff, Larry Christmas, is an adult resident citizen of Hazlehurst, Copiah County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

30. Plaintiff, Sherry Christmas, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

31. Plaintiff, Charlene Collins, is an adult resident citizen of Terry, Hinds County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

32. Plaintiff, Felicia Cooley, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

33. Plaintiff, Jessie Cooper, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

34. Plaintiff, George Copeland, is an adult resident citizen of Jackson, Hinds County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

35. Plaintiff, Minnie Copeland, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

36. Plaintiff, Johnnie Craft, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

37. Plaintiff, Clara Craig, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

38. Plaintiff, Helen Cunningham, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

39. Plaintiff, John Cunningham, Jr., is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

40. Plaintiff, Sandra Davis, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

41. Plaintiff, Dennis Davis, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

42. Plaintiff, Mary Davis, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

43. Plaintiff, Willie Davis, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

44. Plaintiff, S.L. Dawson, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

45. Plaintiff, Jessie Dickens, is an adult resident citizen of Hermitage, Bradley County, Arkansas, and previously resided in Crystal Springs, Copiah County, Mississippi.

46. Plaintiff, Charles Dixon, is an adult resident citizen of Crystal Springs, Copiah

County, Mississippi.

47. Plaintiff, Lindon Dixon, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

48. Plaintiff, Richard Dixon, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

49. Plaintiff, Virginia Dixon, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

50. Plaintiff, Larry Edwards, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

51. Plaintiff, Michael Edwards, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

52. Plaintiff, Johnnie Evans, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

53. Plaintiff, Juliet Evans, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

54. Plaintiff, Walter Evans, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

55. Plaintiff, Willie Funchess, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

56. Plaintiff, Willie Taylor Funchess, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

57. Plaintiff, Robert Gary, is an adult resident citizen of Jackson, Hinds County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

58. Plaintiff, Sonya Gilmore, is an adult resident citizen of Hazlehurst, Copiah County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

59. Plaintiff, Betty Glasper, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

60. Plaintiff, Grace Glasper, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

61. Plaintiff, O.T. Glasper, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

62. Plaintiff, Linda Goodwin, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

63. Plaintiff, Dorothy Graham, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

64. Plaintiff, Billy Green, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

65. Plaintiff, Kenneth Green, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

66. Plaintiff, Johnnie Griffin, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

67. Plaintiff, Larry Hackett, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

68. Plaintiff, Bobby Harris, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

69. Plaintiff, Earnest Harris, is an adult resident citizen of Crystal Springs, Copiah

County, Mississippi.

70. Plaintiff, Gloria Harris, is an adult resident citizen of Hazlehurst, Copiah County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

71. Plaintiff, Martha Harris, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

72. Plaintiff, Mary Harris, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

73. Plaintiff, Cynthia Harrison, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

74. Plaintiff, Larry Harrison, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

75. Plaintiff, Lessie Harrison, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

76. Plaintiff, Christine Hartley, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

77. Plaintiff, Nellie Hollie, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

78. Plaintiff, Angela Holloway, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

79. Plaintiff, Glenda Howard, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

80. Plaintiff, James Hudson, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

81. Plaintiff, Mona Hudson, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

82. Plaintiff, Barbara Jackson, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

83. Plaintiff, Doris Jackson, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

84. Plaintiff, Michael Jackson, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

85. Plaintiff, Randy Jefferson, Sr., is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

86. Plaintiff, Queen Jenkins, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

87. Plaintiff, Richard Jenkins, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

88. Plaintiff, Dorothy Johnson, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

89. Plaintiff, James Johnson, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

90. Plaintiff, Oscar Johnson, is an adult resident citizen of Terry, Hinds County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

91. Plaintiff, Willie Jones, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

92. Plaintiff, Brenda Kendrick, is an adult resident citizen of Crystal Springs, Copiah

County, Mississippi.

93. Plaintiff, Kenneth Kendrick, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

94. Plaintiff, Leverne Kendrick, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

95. Plaintiff, Linda Kendrick, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

96. Plaintiff, Robert Kendrick, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

97. Plaintiff, Thomas Kendrick, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

98. Plaintiff, Yolunda King, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

99. Plaintiff, Henry Lewis, is an adult resident citizen of Georgetown, Copiah County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

100. Plaintiff, Hugh Lewis, is an adult resident citizen of Georgetown, Copiah County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

101. Plaintiff, J.D. Lewis, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

102. Plaintiff, Ora Lewis, is an adult resident citizen of Georgetown, Copiah County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

103. Plaintiff, Sarah Lewis, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

104. Plaintiff, Ervin Lilly, is an adult resident citizen of Hazlehurst, Copiah County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

105. Plaintiff, Sandra Lilly, is an adult resident citizen of Hazlehurst, Copiah County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

106. Plaintiff, Minnie Little, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

107. Plaintiff, Beatrice Lockett, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

108. Plaintiff, Reginald Lowery, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

109. Plaintiff, Nancy Martin, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

110. Plaintiff, Lurene Massey, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

111. Plaintiff, Martha Matthews, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

112. Plaintiff, Georgia McCall, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

113. Plaintiff, T.Ella Miles, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

114. Plaintiff, Lena Miller, is an adult resident citizen of Hazlehurst, Copiah County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

115. Plaintiff, Sarah Miller, is an adult resident citizen of Jackson, Hinds County,

Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

116. Plaintiff, Arnice Millsaps, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

117. Plaintiff, Bobbie Mitchell, is an adult resident citizen of Jackson, Hinds County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

118. Plaintiff, Mae Morris, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

119. Plaintiff, Henry Morris, Jr., is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

120. Plaintiff, Rayford Morris, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

121. Plaintiff, James Murray, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

122. Plaintiff, Loubbertha Murray, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

123. Plaintiff, Edward Myers, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

124. Plaintiff, Rebecca Myers, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

125. Plaintiff, Carrie Newell, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

126. Plaintiff, Faris Newell, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

127. Plaintiff, Mary Newell, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

128. Plaintiff, Michael Newell, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

129. Plaintiff, Mary Nichols, is an adult resident citizen of Jackson, Hinds County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

130. Plaintiff, Robert Osbourne, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

131. Plaintiff, Carl Palmer, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

132. Plaintiff, Kathy Palmer, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

133. Plaintiff, Shirley Patrick, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

134. Plaintiff, Debra Patterson, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

135. Plaintiff, Kenneth Pickett, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

136. Plaintiff, Deborah Pillers, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

137. Plaintiff, Jermaine Porter, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

138. Plaintiff, Johnnie Porter, is an adult resident citizen of Crystal Springs, Copiah

County, Mississippi.

139. Plaintiff, Dozie Powell, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

140. Plaintiff, Eddie Powell, Jr., is an adult resident citizen of Jackson, Hinds County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

141. Plaintiff, Eli Powell, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

142. Plaintiff, Erma Powell, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

143. Plaintiff, Georgia Mae Powell, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

144. Plaintiff, Johnnie Powell, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

145. Plaintiff, Lillie Powell, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

146. Plaintiff, Michael Powell, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

147. Plaintiff, Donald Randall, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

148. Plaintiff, Linda Rayford, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

149. Plaintiff, Enochius Rhymes, is an adult resident citizen of Grenada, Grenada County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

150. Plaintiff, Jessie Rhymes, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

151. Plaintiff, Robert Rhymes, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

152. Plaintiff, Dwight Richardson, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

153. Plaintiff, Randy Robinson, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

154. Plaintiff, Ruth Robinson, is an adult resident citizen of Jackson, Hinds County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

155. Plaintiff, Lorene Sligh, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

156. Plaintiff, Brenda Smiley, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

157. Plaintiff, Thomas Smiley, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

158. Plaintiff, Dorothy Smith, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

159. Plaintiff, Richard Smith, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

160. Plaintiff, Mary Stewart, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

161. Plaintiff, Scottie Stewart, is an adult resident citizen of Jackson, Hinds County,

Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

162. Plaintiff, James Sturgis, is an adult resident citizen of Hazlehurst, Copiah County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

163. Plaintiff, Sidney Sutton, Jr., is an adult resident citizen of Jackson, Hinds County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

164. Plaintiff, E. Charles Taylor, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

165. Plaintiff, Emma Taylor, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

166. Plaintiff, Carl Terrell, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

167. Plaintiff, Jerry Terrell, is an adult resident citizen of McComb, Pike County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

168. Plaintiff, Julia Terrell, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

169. Plaintiff, Beverly Thedford, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

170. Plaintiff, Wilson Thigpen, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

171. Plaintiff, Catherine Tillman, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

172. Plaintiff, Lige Tillman, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

173. Plaintiff, Nathaniel Tobias, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

174. Plaintiff, Gladys Toliver, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

175. Plaintiff, Toni Toliver, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

176. Plaintiff, Early Tyler, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

177. Plaintiff, Darryl Wade, is an adult resident citizen of Raymond, Hinds County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

178. Plaintiff, Pauline Wade, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

179. Plaintiff, Ulysses Wade, Jr., is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

180. Plaintiff, J.T. Wallace, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

181. Plaintiff, W.J. Wallace, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

182. Plaintiff, Amelia Way, is an adult resident citizen of Georgetown, Copiah County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

183. Plaintiff, Elizabeth Welch, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

184. Plaintiff, James Welch, is an adult resident citizen of Crystal Springs, Copiah

County, Mississippi.

185. Plaintiff, Patricia Welch, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

186. Plaintiff, J.C. Wells, is an adult resident citizen of Jackson, Hinds County, Mississippi, and previously resided in Crystal Springs, Copiah County, Mississippi.

187. Plaintiff, Ruth Wells, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

188. Plaintiff, Stella Wells, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

189. Plaintiff, Johnnie Westmoreland, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

190. Plaintiff, Edward Wheeler, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

191. Plaintiff, Brenda Williams, is an adult resident citizen of Chicago, Cook County, Illinois, and previously resided in Crystal Springs, Copiah County, Mississippi.

192. Plaintiff, Dianne Williams, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

193. Plaintiff, Lorine Williams, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

194. Plaintiff, Shirley Williams, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

195. Plaintiff, Stacey Williams, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

196. Plaintiff, Tabbetha Williams, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

197. Plaintiff, Sara Willis, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

198. Plaintiff, Betty Wilson, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

199. Plaintiff, Denise Wilson, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

200. Plaintiff, Edwrick Wilson, Sr., is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

201. Plaintiff, Lemuel Wilson, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

202. Plaintiff, Marcellous Wilson, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

203. Plaintiff, Melvin Wilson, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

204. Plaintiff, Rodrick Wilson, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

205. Plaintiff, Sharon Wilson, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

206. Plaintiff, Trenise Lashun Wilson, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

207. Plaintiff, Grace Young, is an adult resident citizen of Crystal Springs, Copiah

County, Mississippi.

208. Plaintiff, Johnny Young, Sr., is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

209. Plaintiff, Linda Young, is an adult resident citizen of Crystal Springs, Copiah County, Mississippi.

210. Defendant, Kuhlman Corporation, a Delaware Corporation, including its predecessor companies and entities, and its assigns and successor companies and entities, is a Delaware corporation that may be served with process by serving its registered agent, C.T. Corporation System, 1209 Orange Street, Wilmington, Delaware 19801. It also may be served with process by service upon its registered agent(s) for service of process or by service as otherwise provided by the Mississippi Rules of Civil Procedure.

211. Defendant Kuhlman Electric Corporation ("KEC"), incorporated under the laws of the State of Delaware with its principal place of business in Versailles, Kentucky, is registered to do business in Mississippi, and is doing business in Mississippi. It may be served with process by service upon its agent for service of process, C. T. Corporation, 1209 Orange Street, Wilmington, Delaware 19801.

212. Defendant BorgWarner, Incorporated ("BorgWarner") is a foreign corporation incorporated under the laws of the State of Delaware that may be served with process by serving its registered agent, C.T. Corporation, 1209 Orange Street, Wilmington, Delaware 19801. It also may be served with process by service upon its registered agent(s) for service of process or by service as otherwise provided by the Mississippi Rules of Civil Procedure.

213. Defendants, John Doe 1 through John Doe 10, whose identities are unknown to Plaintiffs at this time, will be identified and named with particularity in the event Plaintiffs are

able to identify one or more of them.

JURISDICTION

214. The Court has jurisdiction over the subject matter and Defendants in this case pursuant to 28 U.S.C. §1332 because there is complete diversity of citizenship between Plaintiffs and Defendants and the amount in controversy exceeds \$75,000.00. The Court also has jurisdiction to hear Plaintiffs' claims against Defendants under Rules 20 and 42 of the Federal Rules of Civil Procedure, which allow all Plaintiffs with similar causes of action against common Defendants to join in one action as Plaintiffs and to have certain common issues of law and fact adjudicated in one proceeding.

VENUE

215. Venue in this cause is proper in this Court pursuant to 28 U.S.C. § 1391, because this suit respects individuals who have suffered personal injuries exclusively within the United States District Court for the Southern District of Mississippi, Southern District, and the conduct, acts and/or omissions upon which this cause of action is based occurred within the United States District Court for the Southern District of Mississippi, Southern Division.

JOINDER OF PLAINTIFFS' CLAIMS

216. Each of the Plaintiffs herein has confirmed by laboratory test results the presence of PCBs (Aroclor 1260) in their blood. Each of the Plaintiffs' claims are properly joined in this civil action before this Court pursuant to Rule 20 F.R.C.P. because: (a) the Plaintiffs assert a right or rights to relief with respect to, or arising out of the same transactions, occurrences or series of transactions or occurrences; (b) the Plaintiffs assert questions of law and fact common to all of them which will arise in this action; (c) each of the Plaintiffs need not be interested in obtaining all of the relief demanded; and (d) judgment may be given for one or more of the

Plaintiffs according to their respective rights.

FACTS

217. In the early 1950's, the Kuhlman Corporation began operating a facility to manufacture electrical transformers in Crystal Springs, Copeiah County, Mississippi.

218. In the 1990's the Kuhlman Corporation was merged into Kuhlman Electric Corporation. KEC still presently operates the facility in Crystal Springs, Mississippi ("Kuhlman facility", "Kuhlman site", "KEC facility" or "KEC site"). KEC or its predecessor Kuhlman Corporation continued to own and operate this plant up until March 1, 1999, when it was purchased by BorgWarner Inc. ("BorgWarner").

219. BorgWarner purchased the parent company of KEC, that being Kuhlman Corporation, on October 5, 1999. BorgWarner then sold KEC stock to a company or companies owned and/or controlled by The Carlyle Group and BorgWarner retained the indemnity to KEC. BorgWarner provided an indemnity to KEC and to The Carlyle Group purchasing company(ies). The indemnity covered pre-closing environmental matters at the plant site and other matters relating to contamination or exposure of surrounding property to hazardous contaminants originating from the Kuhlman site, including, but not limited to, costs arising from injuries to persons and property resulting from PCB contamination that originated from the Kuhlman site.

220. KEC manufactured and manufactures electrical transformers of various sizes with fabrication of said transformers occurring on site. The transformers are built on a work order basis and require approximately forty-eight months to be built. Previously, the operations at the KEC plant site included the storage and utilization of oil that contained PCBs to fill or re-fill transformers at the site, or that was drained from transformers on the site. KEC also refurbishes and otherwise repairs transformers which it built.

221. Raw materials that are utilized in the manufacture of transformers are steel, aluminum, copper wire, copper strips, and hard cardboard referred to as T4 cardboard. Various transformer oils have been used in the manufacturing processes since the facility began operations, including PCB-containing oils.

222. From approximately 1951 until approximately 1977, KEC purchased from various companies for use in its manufacturing processes, transformer oils that contained polychlorinated biphenyls ("PCBs").

223. In approximately 1976, PCBs were banned due to the extremely toxic and hazardous characteristics of the substance and the availability of less dangerous alternatives.

224. PCBs remain toxic and do not readily break down in the environment. PCBs enter humans through ingestion, including ingestion of fish, through contact with the skin, and by inhalation.

225. From 1976 until approximately 1990 or later, KEC continued to refurbish and repair transformers containing PCBs at the plant.

226. In approximately 1972, Monsanto Chemical Company ("Monsanto") a seller of PCBs, warned Kuhlman and KEC of the hazardous nature of PCBs and their persistence in the environment. Also in the early 1970's, Monsanto required its purchasers of dielectric fluid containing PCBs, including Kuhlman, to sign agreements to indemnify Monsanto should Monsanto ever be found liable as a result of any claims brought against it for exposure to PCBs. Kuhlman and KEC were thus aware of the potential hazards of PCBs no later than the early 1970's.

227. Around the time PCBs were banned in the late 1970's, industry trade associations, of which KEC and Kuhlman were members, set up guidelines for eliminating PCBs from the

environment to which they did not adhere.

228. Between approximately 1951 and 1977, Kuhlman and Kuhlman Electric improperly and negligently disposed of waste transformer oil containing PCBs by burying and surface deposition of the oil at its plant site and other sites in Crystal Springs, Mississippi. Kuhlman and Kuhlman Electric also improperly disposed of contaminated waste transformer oil by spraying it for dust suppression, causing drifts of contaminated oil to leave the Kuhlman property.

229. On information and belief, Kuhlman and KEC continued to improperly dispose of PCB wastes at its plant site and other sites, despite knowledge of the hazardous and toxic nature of the chemicals. KEC and BorgWarner have failed to properly eliminate and control the release and migration of PCB-contaminated soil, dust and volatilization of PCBs from the KEC site to surrounding and neighboring properties for decades, even up to the present, even with knowledge of the dangers and hazards of PCB contamination and knowledge that the KEC site was contaminated with PCBs.

230. Kuhlman, KEC and BorgWarner improperly, negligently, recklessly, intentionally and/or with gross negligence, disposed of waste transformer oil and material containing PCBs on and off of the KEC site, failed to properly clean up and/or remediate areas of spills and releases of PCBs on and off of the KEC site, failed to notify regulatory authorities and the general public of the existence or probable existence of PCBs on and off of the KEC site, and failed to eliminate and/or control the migration of PCBs, or its by-products, off of the KEC site to Plaintiffs. Kuhlman and KEC also improperly released and disposed of PCB-contaminated waste transformer oil by spraying it for dust suppression on the KEC site, causing drifts of contaminated oil and dust to leave the KEC site and contaminate Plaintiffs.

231. On information and belief, Kuhlman and KEC continued to improperly dispose of PCB wastes at its plant site, despite knowledge of the hazardous and toxic nature of the chemicals. Kuhlman, KEC and BorgWarner have failed to properly eliminate and control the release and migration of PCB-contaminated soil, dust and volatilization of PCBs from the KEC site to surrounding and neighboring properties for decades, even up to the present, even with knowledge of the dangers and hazards of PCB contamination and knowledge that the KEC site was contaminated with PCBs, and Defendants knew, or should have known, that the surrounding areas and Plaintiffs would continue to be exposed to PCBs.

232. Kuhlman, KEC and BorgWarner misrepresented and concealed, and conspired to conceal and misrepresent, from regulatory authorities and the general public in Crystal Springs, Mississippi, that the KEC site and surrounding and neighboring properties were contaminated with PCBs in order that those Defendants could avoid regulatory penalties, remediation costs and litigation, and could otherwise increase their profits at the expense of the Plaintiffs and other citizens of Crystal Springs, Mississippi.

233. On or about April 2000, a plant expansion occurred at the KEC site. Defendants directly and/or indirectly approved of and/or controlled the plant expansion construction work to be performed at the KEC site. The construction and excavation at the plant site caused the PCB-contaminated soil to migrate about and off of the KEC site and further contaminate Plaintiffs with PCBs via airborne/windblown dust, storm water runoff and volatilization of PCBs. Defendants knew, or should have known, that the KEC site was contaminated or had a high likelihood of contamination with PCBs. Further, Defendants knew, or should have known, that their soil excavation activities would cause the transmission of PCB-contaminated soil, dust and volatilization of PCBs off of the KEC plant site to the surrounding areas.

234. On December 1, 2005, the U.S. Department of Health and Human Services Agency for Toxic Substances and Disease Registry ("ATSDR") prepared a Health Consultation with respect to Kuhlman Electric Company. The Mississippi Department of Environmental Quality ("MDEQ") requested a health hazard determination because of five properties contaminated with PCBs (Aroclor 1260) migrating from the Kuhlman Electric Corporation. The source of the contamination was reported to be a drainage channel carrying storm water from the KEC plant northwest to Lake Chautauqua. Analytical results indicated that PCBs had affected multiple locations in excess of the MDEQ maximum allowable concentration of 1 ppm, with some areas exceeding 50 ppm. MDEQ required initial remediation at locations with PCB contamination greater than 10 ppm, with the remediation continuing at contamination locations greater than 1 ppm.

235. BorgWarner has maintained control over the remediation of the KEC facility and the impacted area pursuant to indemnification terms between BorgWarner and KEC and/or Kuhlman. The remediation activities of BorgWarner at the KEC plant site were negligently performed, resulting in additional and continued exposure of PCBs to Plaintiffs, originating from the Kuhlman plant site.

236. Upon information and belief, the subject contamination continues to migrate into the environment through several pathways causing egregious harm, continuing to damage the health of the Plaintiffs and other citizens of Crystal Springs, Mississippi.

237. The acts and omissions of the Defendants were the direct and proximate cause, or proximate contributing cause, of the PCB exposure and contamination of the Plaintiffs. As a result of the Defendants' acts and omissions, Plaintiffs have experienced varying health problems including, but not limited to, the existence of PCBs (Aroclor 1260) in Plaintiffs' blood

and body.

238. The acts and omissions of all of the Defendants in contaminating the water, land, fish, and air with PCBs were the direct and proximate cause, or proximate contributing cause, of the PCB exposure and contamination of the Plaintiffs. As a result of the Defendants' acts and omissions, Plaintiffs have experienced varying health problems including, but not limited to, elevated levels of PCBs in Plaintiffs' blood and body, cancer, diabetes, cardiovascular disease and hypertension, respiratory disease and asthma, endocrine system disorders, skin rashes, and other adverse health conditions.

CAUSES OF ACTION

COUNT ONE - NEGLIGENCE

239. Plaintiffs reallege the preceding paragraphs as if fully rewritten herein.

240. Defendants owed, and at all relevant times owed, a duty of reasonable care to the Plaintiffs. Plaintiffs were reasonably foreseeable victims of the dissemination and deposition of PCBs off of the Kuhlman plant site, of which Defendants were aware. The Defendants, their officers, agents, independent contractors and employees knew, or should have known with the exercise of reasonable care, that the transformer operation and hazardous waste disposal practices of Kuhlman and Kuhlman Electric emitted and is emitting toxic substances and airborne particulates which were and are contained in soil on the Kuhlman plant site, running off, through and gathering on and about properties and surface waters, and that such was and is injurious to the health and welfare of the persons living near the plant and the contaminated areas, including Plaintiffs.

241. As a result of Defendants' negligent acts and omissions, extensive PCB contamination has been documented in the area surrounding Kuhlman and nearby communities

and waterways.

242. As a result of The Defendants' wrongful conduct, Defendants have breached the due care owed to the Plaintiffs.

243. As a direct and proximate result of the negligence of Defendants, as set forth herein above, Plaintiffs have suffered personal injuries. Actual damages should be awarded to the Plaintiffs for all injuries caused by the negligent acts and/or omissions of the Defendants.

COUNT TWO - GROSS NEGLIGENCE

244. Plaintiffs reallege the preceding paragraphs as if fully rewritten herein.

245. Defendants owed, and at all relevant times owed, a duty of reasonable care to Plaintiffs. Plaintiffs are reasonably foreseeable victims of the dissemination and deposition of PCBs off of the KEC plant site.

246. At all relevant times Defendants knew, or should have known, of the dangers and hazards of PCBs to Plaintiffs' health and well-being. Since Defendants possessed such knowledge, or should have possessed it, the acts and/or omissions of Defendants, their officers, agents and employees that failed to prevent the PCBs and other contaminants from migrating offsite that disposal of waste containing PCBs and other contaminants onto the ground, air and in surface waters, that allowed contaminants to escape into and be carried by the air into the environment that caused or allowed contaminated soils and dust to be transported from the KEC facility and deposited throughout the City of Crystal Springs, Mississippi, all constitute gross neglect which exhibits a willful, wanton and reckless disregard for the rights of the Plaintiffs and other citizens of the City of Crystal Springs, Mississippi.

247. As a direct and proximate result of the gross negligence and/or willful and

wanton acts and/or reckless disregard of Defendants, Plaintiffs have suffered, suffer now and will continue to suffer in the future, physical, mental and emotional personal injury.

Defendants' gross negligence, willful and wanton acts and/or reckless disregard, and violation of Mississippi statutes entitles Plaintiffs to punitive damages against each Defendant in such a sum as to punish Defendants, and to deter Defendants and others similarly situated, from engaging in such irresponsible and dangerous activities.

COUNT THREE - NEGLIGENCE PER SE

248. Plaintiffs reallege the preceding paragraphs as if fully rewritten herein.

249. As an alternative ground for relief, Plaintiffs assert a claim for negligence per se.

250. Defendants owed a duty to Plaintiffs to obey all laws enacted or adopted for the protection of the general public, including Plaintiffs.

251. Defendants' failure to cease the release or disposal of PCBs into the environment, to properly report their violations, to properly remediate soil contamination at the KEC site and offsite, and to prevent the offsite migration of PCBs and other contamination constitutes violation of state laws, specifically Miss. Code Ann. §§17-17-1 et seq. and 49-17-1, et seq. Said laws are designed to protect the class of individuals, of which Plaintiffs are a members, from the precise type of harms suffered by Plaintiffs as a proximate result of the violations of said laws by Defendants.

DAMAGES

252. The aforesaid acts and/or omissions of the Defendants were the proximate cause, or proximate contributing cause, of the injuries and damages suffered and sustained by Plaintiffs,

and Plaintiffs are entitled to recover all damages allowed by law, including, but not limited to, the following damages:

- (a) Damages for the personal injuries to Plaintiffs resulting from the exposure and contamination by PCBs that emanated from the Kuhlman site;
- (b) Damages for Plaintiffs' past, present and future physical and mental pain and suffering, as well as the loss of enjoyment of life;
- (c) Damages for Plaintiffs' emotional distress, anxiety, fear, aggravation and inconvenience that has been caused by concern over exposure and PCB contamination;
- (d) Damages for any and all other actual and/or consequential damages, including medical expenses and lost wages, flowing from personal injuries to the Plaintiffs as result of exposure or contamination by PCBs that originated from the KEC site; and
- (e) Punitive damages from, of and against each Defendant, for their wanton, willful, grossly negligent and/or reckless disregard for the health and welfare of the Plaintiffs for all the reasons stated hereinabove.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs demand judgment from, of and against all Defendants, jointly and severally, in an amount that will adequately compensate Plaintiffs for their actual and consequential damages described herein. In addition, Plaintiffs seek punitive damages from, of and against all Defendants, in an amount to be determined by a jury to punish Defendants, and deter them and others similarly situated from engaging in similar wrongful acts and omissions. Plaintiffs seek pre-judgment and post-judgment interest, costs of court and reasonable attorneys' fees to be assessed against all Defendants. Plaintiffs additionally

pray for such other and further relief, both general and specific, at law or in equity, to which Plaintiffs may be entitled in the premises.

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a trial by jury.

RESPECTFULLY SUBMITTED this the 27th day of December, 2007.



Don A. Mitchell, MB # 9076

OF COUNSEL:

Don A. Mitchell, MB# 9076
ATTORNEY AT LAW
403 South State Street
Jackson, Mississippi 39201
(601) 354-9801 – Telephone
(601) 352-5353 - Facsimile

Sheila M. Bossier, MB#10618
BOSSIER & ASSOCIATES, PLLC
1520 North State Street
Jackson, Mississippi 39211
(601) 352-5450 – Telephone
(601) 352-5452 - Facsimile